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10 Attorneys for People of the State of California *ex rel.*
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12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 **PEOPLE OF THE STATE OF CALIFORNIA**
17 ***ex rel.* EDMUND G. BROWN JR.,**
18 **ATTORNEY GENERAL OF THE STATE OF**
CALIFORNIA,

19 Plaintiff,

20 **v.**

21 **ENVIRONMENTAL PROTECTION**
22 **AGENCY,**

23 Defendant.

Case No.: C 08-00735 SC

DECLARATION OF LAURA J.
ZUCKERMAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
VAUGHN INDEX

Date: April 25, 2008
Time: 10:00 a.m.
Place: Courtroom 1, 17th Floor
Judge: Hon. Samuel Conti

1 I, LAURA J. ZUCKERMAN, declare as follows:

2 1. I am a Deputy Attorney General and one of counsel of record in this matter. This
3 declaration is based on personal knowledge, and if called as a witness I could and would testify
4 competently to the facts set forth herein.

5 2. To date, defendant EPA has failed to respond to plaintiff's December 27, 2007 request
6 for records under the Freedom of Information Act, 5 U.S.C. §552, *as amended*, or to provide an
7 index to the documents withheld (a "*Vaughn* index").

8 3. Plaintiff has requested that defendant provide a *Vaughn* index, but to date EPA has not
9 agreed.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed on March 21, 2008.

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13 /S/ LAURA J. ZUCKERMAN
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